

**JAMES KOUSOUROS**  
ATTORNEY AT LAW

JAMES KOUSOUROS  
FOUNDER & PRINCIPAL

260 Madison Avenue, 22nd floor • New York, NY 10016  
212•532•1934 / 212•532•1939 fax  
E-mail: James@kousouroslaw.com

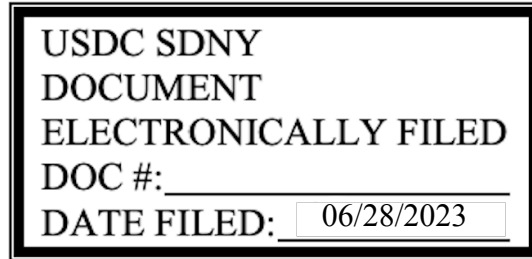
STUART GOLD  
SENIOR COUNSEL

EMMA J. COLE  
LEGAL ASSISTANT

June 27, 2023

By ECF

Hon. Victor Marrero  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312



**Re: *United States v. Narek Marutyan, et al.*, 20 Cr. 652 (VM)**

Dear Judge Marrero:

This letter is respectfully submitted to request the Court modify the conditions of Mr. Marutyan's bond from his current bond condition of a curfew set at the discretion of Pretrial Services to "stand alone GPS monitoring," and to permit him travel to Pennsylvania, Connecticut and Massachusetts for employment purposes.

In January 2023, the Court modified the conditions of the bond to remove the home detention condition given that Mr. Marutyan had secured employment as a warehouse delivery driver and granted Pretrial Services the discretion to set a curfew permitting him to work.

Pretrial Services Officer Francesca Piperato has no objection to the instant requests and notes that Mr. Marutyan "is already on a GPS bracelet and is essentially out of the residence for work etc. from 6AM-11PM. He has traveled out of the district and essentially was not monitored on a curfew and is in full compliance." Assistant United States Attorney Emily Deininger defers to the position of Pretrial Services.

Thus, we respectfully request that the Court grant an Order and modify the conditions of Mr. Marutyan's bond from a curfew set by Pretrial Services to stand alone GPS monitoring and permit travel to Pennsylvania, Connecticut and Massachusetts for employment purposes.

Thank you for your consideration.

Respectfully submitted,


/s/ James Kousouros

James Kousouros, Esq.

c.c.

Emily Deininger  
Assistant United States Attorney

Francesca Piperato  
Pretrial Services Officer

<b>Request GRANTED.</b>	The Court modifies the conditions of Mr. Marutyan's bond from a curfew set by Pretrial Services to stand alone GPS monitoring and permit to travel to Pennsylvania, Connecticut and Massachusetts for employment purposes, on the terms and conditions stated above.
<b>SO ORDERED.</b>	
<div>06/28/2023</div> <b>DATE</b>	<b>VICTOR MARRERO, U.S.D.J.</b>